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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2011-733**

12 **RIMMY SILABAN**
1248 West J St., Apt. C
13 Ontario, CA 91762

ACCUSATION

14 **Registered Nurse License No. 741594**

15 Respondent.
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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
22 Department of Consumer Affairs.

23 2. On or about December 19, 2008, the Board issued Registered Nurse License No.
24 741594 to Rimmy Silaban ("Respondent"). The Registered Nurse License was in full force and
25 effect at all times relevant to the charges brought herein and will expire on May 31, 2012, unless
26 renewed.

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1 **COST RECOVERY**

2 7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 **FIRST CAUSE FOR DISCIPLINE**

7 **(Procuring a Certificate or License by Fraud or Misrepresentation)**

8 8. Respondent is subject to disciplinary action under Code section 2761, subdivision (b),
9 in that she submitted a graduation certificate and college transcripts to the Board representing that
10 she had obtained her nursing diploma from Universitas Advent Indonesia, Sekolah Pengatur
11 Rawat Rumah Sakit Advent Bandung (School of Nursing). In fact, the graduation certificate and
12 transcripts were fraudulently prepared and Respondent never attended and never obtained a
13 diploma from Universitas Advent Indonesia, Sekolah Pengatur Rawat Rumah Sakit Advent
14 Bandung (School of Nursing).

15 **SECOND CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct - False Statements)**

17 9. Respondent is subject to disciplinary action under Code section 2761, subdivision (e),
18 in that she represented to the Board that she obtained her nursing diploma from Universitas
19 Advent Indonesia, Sekolah Pengatur Rawat Rumah Sakit Advent Bandung (School of Nursing),
20 when in fact, she had not, as further described in paragraph 8.

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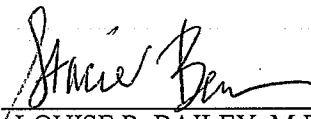
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Registered Nurse License No. 741594, issued to Rimmy Silaban;
2. Ordering Rimmy Silaban to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: 2/28/11

for 
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
State of California
Complainant

DOJ Matter ID: LA2009311630
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